

Mr. Robert M. Clark  
Guardian Automotive Trim, Inc.  
P.O. Box 5109  
Evansville, IN 47716-5109

Re: 163-11080  
First Administrative Amendment to  
Part 70 No.: T163-6502-00017

Dear Mr. Clark:

Guardian Automotive Trim, Inc. was issued Part 70 operating permit T163-6502-00017 on January 19, 1999 for an automotive decorative trim coating operation. An application to modify the source was received on February 5, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

- (a) Condition A.2, Page 5 of 49  
Add to the listing of emission units the following:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) Department 23 high gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-1, consisting of ~~four (4)~~ **five (5) spray booths (HVL, its equivalent or better (e.g., electrostatic)) High Volume, Low Pressure (HVL) spray booths** (23-5B, 23-6B, 23-7B, ~~and 23-8B, and 23-13B~~), each using water back booths for Particulate Matter (PM) control, each exhausting to one (1) stack (23-5B, 23-6B, 23-7B, ~~and 23-8B, and 23-13B~~);
- (b) Section D.4, Pages 41a, 41b, and 41c, was added to the existing Title V (T163-6502-00017) permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Yvette de los Angeles, at (800) 451-6027, press 0 and ask for Duane Van Laningham or extension (3-6878), or dial (973) 575-2555, extension 3216.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments  
YD/EVP

cc: File - Vanderburgh County  
U.S. EPA, Region V  
City of Evansville EPA  
Southwest Regional Office  
Air Compliance Section Inspector - Dave Holder  
Compliance Data Section - Jerri Curless  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Nancy Landau

**PART 70 OPERATING PERMIT  
OFFICE OF AIR MANAGEMENT  
and  
CITY OF EVANSVILLE EPA**

**Guardian Automotive Trim, Inc.  
601 North Congress Avenue  
Evansville, Indiana 47715**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-6502-00017	
Original Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 19, 1999
First Administrative Amendment: 163-11080	Pages Affected: 3, 3a, 4, 41a, 41b, 41c
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and City of Evansville EPA. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary automotive decorative trim coating operation.

Responsible Official: Robert M. Clark  
Source Address: 601 North Congress Avenue, Evansville, Indiana 47715  
Mailing Address: P.O. Box 5109, Evansville, Indiana 47716-5109  
SIC Code: 3089  
County Location: Vanderburgh  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) Department 23 high gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-1, consisting of five (5) spray booths (HVLP, its equivalent or better (e.g., electrostatic)) (23-5B, 23-6B, 23-7B, 23-8B, and 23-13B), each using water back booths for Particulate Matter (PM) control, each exhausting to one (1) stack (23-5B, 23-6B, 23-7B, 23-8B, and 23-13B);
- (2) One (1) Department 23 low gloss robotic spray coating line, coating plastic parts, constructed in March, 1994, identified as U23-2, consisting of four (4) High Volume, Low Pressure (HVLP) spray booths (23-9B, 23-10B, 23-11B and 23-12B), each using water back booths for Particulate Matter (PM) control, each exhausting to one (1) stack (23-9B, 23-10B, 23-11B, 23-12B and 23-1H);
- (3) One (1) Department 13 (formerly Department 14) air atomization hand spray coating booth, coating plastic parts, constructed before 1980, no identification number assigned (formerly 14-1B), using fabric filters for Particulate Matter (PM) control, exhausting to one (1) stack (no identification number assigned (formerly 14-1B)) and three (3) Department 13 automatic paint machines, identified as 13-7, 13-8, and 13-9, coating plastic parts, constructed before 1980, using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (13-1A, 13-2A, and 13-3A);
- (4) One (1) Department 13 hand spray coating line, coating plastic parts, constructed before 1980, identified as U13-1, consisting of three (3) air atomization spray booths (13-7B, 13-8B and 13-9B), spray booth 13-7B using a water back booth for Particulate Matter (PM) control and spray booths 13-8B and 13-9B using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (13-7B, 13-8B and 13-9B);
- (5) One (1) Department 13 air atomization hand spray coating booth, coating plastic parts, constructed before 1980, identified as U13-2, using a water back booth for Particulate Matter (PM) control, exhausting to one (1) stack (13-6B);

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) Department 23 high gloss robotic spray coating booth (Adhesion Promoter Booth), identified as 23-13B, coating plastic parts, constructed in 1999, consisting of a spray application system (HVLP, its equivalent or better (e.g., electrostatic)), using water back booths of Particulate Matter control, exhausting to one (1) stack (23-13B). This new booth will be added to existing Department 23 high gloss robotic spray coating line (U23-1).
- (b) Four (4) new application guns (HVLP, its equivalent or better (e.g., electrostatic)) and four (4) new water back booths for particulate matter control to replace the application guns and the water back booths in Department 23 high gloss robotic spray coating line (U23-1).

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 8-1-6 (General Reduction Requirements, the Best Available Control Technology (BACT) shall consist of the following for the one (1) Department 23 high gloss robotic spray coating booth (23-13B):
  - (1) The use of high volume, low pressure (HVLP) applicators, its equivalent or better (e.g., electrostatic);
  - (2) The use of the solventless mask washers;
  - (3) The use of solventless boothcoat; and
  - (4) An annual report must be submitted to the Evansville Environmental Protection Agency on the feasibility of the use of water-based coatings or any other method of reducing VOC emissions.

#### D.4.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the following requirements will make the one (1) Department 23 high gloss robotic spray coating line and the one (1) Department 23 low gloss robotic spray coating line not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration):

- (a) The amount of non-acetone solvent, including thinners and cleanup solvents, delivered to the applicators shall be limited to 246 tons per 12 month consecutive period, rolled on a monthly basis.

#### D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations) the particulate matter (PM) from the one (1) Department 23 high gloss robotic spray coating booth (23-13B) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

**D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) Department 23 high gloss robotic spray coating booth (23-13B).

**Compliance Determination Requirements**

**D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) or Particulate Matter (PM) limits specified in Conditions D.4.1, D.4.2 and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.4.6 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, and City of Evansville EPA reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.4.7 VOC Emissions**

Compliance with Condition D.4.2(a) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**D.4.8 Particulate Matter (PM)**

Pursuant to 326 IAC 6-3-2(c), the water back booth shall be in operation at all times the one (1) Department 23 high gloss robotic spray coating booth (23-13B) is in operation.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.4.9 Monitoring**

- (a) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.4.10 Record Keeping Requirements**

- (a) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1 and D.4.2.



- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.4.9, the Permittee shall maintain a log of monthly overspray observations and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.2(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.